

REMARKS

Reconsideration of this application as amended is respectfully requested.

In the Office Action, claims 1-20 were pending. Claims 1-20 were rejected. In this response, no claim has been canceled. Claims 1-2, 4, 9-10, 12, 17, and 19-20 have been amended. A portion of the specification has been amended. No new matter has been added.

Claims 1-20 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,229,929 of Lynch et al. ("Lynch") in view of U.S. Patent No. 6,327,392 of Li ("Li").

Applicant hereby reserves the right to swear behind, Lynch and/or Li.

It is respectfully submitted that claims 1-20 as amended include limitations that are not disclosed or suggested by Lynch and Li, individually or in combination. Specifically, independent claim 1 as amended recites as follows:

1. A method comprising:
receiving a sequence of image data to compress; and
specifying scalar quantization with a power of two step size using three bit values to apply to the sequence of image data, wherein the three bit values specify a number of bitplanes to be truncated during the quantization.

(Emphasis added)

Independent claim 1 includes limitations that specifying scalar quantization (based on the bitplane as a quantization unit) with a power of two step size using three bit values (e.g., using three bits to indicate the scalar quantization), where the three bit values are used to specify the number of bitplanes to be truncated during the quantization. The above limitations are absent from the cited references, individually or in combination.

Although Lynch indicates using a power of two as a quantization step, Lynch fails to provide sufficient detailed information that would enable one with ordinary skill in the art to

implement such a process. Particularly, as acknowledged by the Examiner, Lynch fails to disclose or suggest using three bit values to apply to the sequence image data.

However, the Examiner contends that Li (e.g., col. 9, lines 55-60) discloses using three bit values to apply to the sequence image data. Applicant respectfully disagrees. Specifically, Li states:

“In JPEG 2000 VM2, the quantized coefficients are coded by a partial bitplane arithmetic coder. Within a band bitplane, the bits are further grouped into three partial bitplanes, or three sub-modes: (1) the predicted significance mode, where the current coefficient is insignificant, but at least one of its neighbor coefficients is significant; (2) the refinement mode, where the current coefficient is significant; (3) predicted insignificance mode, where the current coefficients and all of its neighbor coefficients are insignificant.”

(Li, col. 9, lines 54-62, emphasis added)

Thus, Li groups the bits into three partial bitplanes or three sub-modes, rather than using three bit values as a power of two step size to specify scalar quantization using three bits to specify number of bitplanes to be truncated during a quantization, as is done in the present invention as claimed. It appears that the respective section of Li is not related to scalar quantization. Therefore, Li also fails to disclose or suggest the limitations set forth above. Therefore, even if they were combined, such a combination lacks the limitations set forth above. In addition, there is no suggestion within Lynch and Li to combine both references. They are both not directed toward solving the same problem as the present invention as claimed. Therefore, for the reasons set forth above, it is respectfully submitted that independent claim 1 is patentable over Lynch in view of Li.

Similarly, independent claims 9, 17, and 20 include limitations similar to those recited in claim 1. Thus, for at least the reasons similar to those discussed above, claims 9, 17, and 20 are patentable over Lynch in view of Li.

Given that claims 2-8, 10-16, and 18-19 depend from one of the above independent claims, it is respectfully submitted that claims 2-8, 10-16, and 18-19 are patentable over Lynch in view of Li. Withdrawal of the rejections is respectfully requested.

In view of the foregoing, Applicant respectfully submits the present application is now in condition for allowance. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call the undersigned attorney at (408) 720-8300.

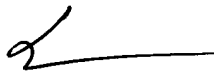
Please charge Deposit Account No. 02-2666 for any shortage of fees in connection with this response.

Respectfully submitted,

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Date:

3/23/24



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